

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

HARTFORD FIRE INSURANCE COMPANY,
Plaintiff,

v.

EASTERN CONTRACTORS, INC.,
Defendant/Third-Party Plaintiff

C.A. No. 03-12502 NMG

v.

CITY OF LAWRENCE, CITY OF FALL RIVER
and FREETOWN/LAKEVILLE REGIONAL
SCHOOL DISTRICT,
Third-Party Defendants.

**HARTFORD FIRE INSURANCE COMPANY'S
MOTION TO AMEND PRE-TRIAL SCHEDULE**

Plaintiff, Hartford Fire Insurance Company ("Hartford") requests that the Pre-Trial Schedule in this case be modified to defer certain discovery to permit Hartford to file a motion for partial summary judgment with respect to three (3) of the seven (7) construction projects involved in this matter. The purpose of the Motion is not to unnecessarily delay the resolution of this matter. To the contrary, it is the expectation of Hartford that if its motion for partial summary judgment is granted, the case will be streamlined thereby reducing by weeks the length of any potential trial. At the same time, by eliminating 3 of the 7 projects for this matter by way of summary judgment, the prospects for an amicable resolution of this matter would significantly increase.

A brief in support of this Motion is attached.

Respectfully Submitted,
HARTFORD FIRE INSURANCE
COMPANY

By its attorneys,

/s/ Bradford R. Carver

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